

John E. Flaherty
Jonathan M.H. Short
McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07109
(973) 622-4444

Attorneys For Plaintiffs
AstraZeneca Pharmaceuticals LP and
AstraZeneca UK Limited

Of Counsel
Henry J. Renk
Bruce C. Haas
Steven C. Kline
FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, New York 10104
(212) 218-2100

Charles E. Lipsey
Mark J. Feldstein
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
Two Freedom Square
11955 Freedom Drive
Reston, Virginia 20190
(571) 203-2700

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ASTRAZENECA PHARMACEUTICALS LP and)
ASTRAZENECA UK LIMITED,)

Plaintiffs,)

v.)

Civil Action No. 10-cv-5519 (JAP)(TJB)

MYLAN PHARMCEUTICALS INC. and MYLAN)
INC.,)

Defendants.)

**PLAINTIFFS' MOTION TO COMPEL THE MYLAN
DEFENDANTS TO PRODUCE RULE 30(b)(6) WITNESS(ES)**

PLEASE TAKE NOTICE that Plaintiffs AstraZeneca Pharmaceuticals LP and
AstraZeneca UK Limited ("AstraZeneca") will move before this Court at the Clarkson S. Fisher
Federal Bldg. & U.S. Courthouse, 402 E. State Street, Trenton, NJ 08608, on June 20, 2011 at 9

a.m., before Magistrate Judge Tonianne J. Bongiovanni, for entry of an Order compelling defendants Mylan Pharmaceuticals Inc. and Mylan Inc. (collectively "Mylan") to produce 30(b)(6) deposition witness(es) to testify on topics relevant to AstraZeneca's claims and Mylan's defenses in the above-captioned litigations.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Plaintiffs shall rely upon the accompanying Memorandum of Law, and all papers and proceedings on file herein. A proposed Order granting Plaintiffs' motion is attached.

Respectfully submitted,

Dated: May 27, 2011

By: /s/ John E. Flaherty
John E. Flaherty
Jonathan M.H. Short
MCCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102
(973) 622-4444
(973) 624-7070 (Facsimile)

Of Counsel
Henry J. Renk
Bruce C. Haas
Steven C. Kline
FITZPATRICK, CELLA,
HARPER & SCINTO
1290 Avenue of the Americas
New York, New York 10104-3800
(212) 218-2100
(212) 218-2200 (Facsimile)

Charles E. Lipsey
Mark J. Feldstein
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190
(571) 203-2700
(202) 408-4400 (Facsimile)

*Attorneys for Plaintiffs
AstraZeneca Pharmaceuticals LP and
AstraZeneca UK Limited*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of **PLAINTIFFS' MOTION TO COMPEL DEFENDANTS TO PRODUCE RULE 30(b)(6) WITNESS(ES) FOR DEPOSITION; MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION; EXHIBITS 1-12 ATTACHED THERETO; and PLAINTIFFS' PROPOSED ORDER** were caused to be served this 27th day of May, 2011 upon the following in the manner provided:

Via ECF and Email

William A. Rakoczy
Amy D. Brody
Jeffrey A. Marx
Luke T. Shannon
Rakoczy Molino Mazzochi Siwik LLP
6 West Hubbard St., Suite 500
Chicago, IL 60654

Arnold B. Calmann
Geri Albin
Saiber
18 Columbia Turnpike
Suite 200
Florham Park, NJ 07932

/s/ John E. Flaherty